

REMARKS

This is in response to the Office Action dated January 12, 2007. Applicant has amended the application as set forth above. In more specific, claims 1 and 2 have been amended, and claim 3 is original. All the features of the amended claims are fully supported by the originally filed application including lines 5-17, page 10; lines 6-14, page 14 of the original specification (WO2004/069540) and Figs. 1-5 of the original drawings. Thus, the amendments do not add new matter to the application. Upon the entry of the amendments, claims 1-3 are pending in this application. Applicant respectfully requests the entry of the amendments and reconsideration of the application.

Claim Rejections under 35 U.S.C. §102

The Examiner rejected claims 1-3 under 35 U.S.C. §102(b) as being anticipated by JP 56137968 to Fujishiro. Applicant respectfully disagrees with the Examiner. Also, in response, Applicant has amended claims 1 and 2.

Fujishiro Does not Anticipates Pending Claims 1 through 3

Applicant respectfully submits that claims 1-3 are not anticipated by Fujishiro.

The Law of Anticipation

Anticipation under Section 102 can be found only if a reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775 (*Fed. Cir. 1985*). More particularly, the finding of anticipation requires the disclosure in a single piece of prior art of each and every limitation of a claimed invention. *Electro Med. Sys. S.A. v. Cooper Life Sciences*, 34 F.3d 1048, 1052 (*Fed. Cir. 1994*). “To anticipate, every element and limitation of the claimed invention must be found in a single prior art reference, arranged as in the claim.” *Brown v. 3M*, 265 F.3d 1349 (*Fed. Cir. 2001*).

Disclosure of Fujishiro

Fujishiro discloses perfecting rotary press having one-surface printing unit consisting of a plate cylinder 10 and an impression cylinder 14 for front-surface printing and another one-surface printing unit consisting of another plate cylinder 21 and another impression cylinder 25

for back-surface printing, in which the two one-surface printing units are installed on the right and left sides of the machine bed 1 (See, e.g., Abstract; Figs. 1 and 5-9). Also, the axis of rotation of the Fujishiro's plate cylinders (11, 12, 22, 23) moves around, and the rotational direction of the plate cylinders keeps changing (See, e.g., Figs. 1 and 4).

Fujishiro Does Not Anticipate Claims 1-3

Claims 1-3 are directed to a rotary press. The features include: the printing unit comprises one or more blanket cylinder (21, 23, 25, 31, 33, 41, 43, 45) and one or more plate cylinder (22, 24, 26, 42, 44, 46); *the printing unit of the present invention does not have any impression cylinder*; the tension of the printing paper (9) passing through printing units is always maintained to be constant; *the plate cylinder does not change its position relative to the other cylinders*; the position of a printing pin of each printing unit is consistently maintained to thus prevent a pin secession phenomenon of a printed image from occurring; and the printing paper (9) passing through two or more blanket cylinders contacts the cylinders in a surface-to-surface manner.

As discussed above, in Fujishiro's rotary press, the plate cylinders' rotational axis is moving around (Fig. 4) and the rotational direction is also changing (Fig. 1); clockwise and counterclockwise. With these limitations in the structure, it is very difficult to obtain a color image of high quality. That is, the printing pin of each printing unit cannot be maintained consistently. Also, the Fujishiro's rotary press has a plurality of impression cylinders to hold the printing paper while the plate cylinder prints on it. Therefore, for double-side color printing, Fujishiro's rotary press needs two towers of printing units disposed apart from each other, one tower structure for one-surface printing, which makes the traveling distance of the printing paper much longer such that the printing pin gets worsen.

However, the rotary press according to the present invention does not include a single impression cylinder. Instead, the printing paper is inserted and past through two or more blanket cylinders. Such structural features make the printing paper contact the blanket cylinders in surface-to-surface manner such that the tension of paper passing through the printing units is kept constant all the time. Furthermore, the cylinders in the present invention do not change its rotational direction, which makes it possible, and facilitates, to keep the tension of the printing paper constant. In contrast, Fujishiro's plate cylinders keep changing

their rotational directions as well as the positions of the rotational axes, which makes it unavoidable to apply variable tension to the printing paper.

In view of foregoing, Fujishiro does not anticipate claims 1-3 of the present invention. Applicant respectfully requests withdrawal of the rejections.

Dependent Claims

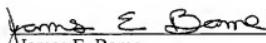
Although applicant has not addressed all the issues of the dependent claims, applicant respectfully submits that applicant does not necessarily agree with the characterization and assessments of the dependent claims made by the examiner, and applicant submits that each claim is patentable on its own merits. Claim 3 is dependent directly on claim 2. Therefore, Applicant respectfully requests prompt allowance of the claims.

Conclusion

In view of the amendments and remarks made above, it is respectfully submitted that claims 1-3 are in condition for allowance, and such action is respectfully solicited. If it is believed that a telephone conversation would expedite the prosecution of the present application, or clarify matters with regard to its allowance, the Examiner is invited to contact the undersigned attorney at the number listed below.

Respectively submitted,

Date: April 12, 2007


James E. Bame
Regis. No. 44521
Tel: 213-384-7200
IPLA P.A.
3580 Wilshire Blvd 17th Fl.
Los Angeles, CA 90010